

EXHIBIT A



DEPARTMENT OF LAW

CITY OF CHICAGO

December 6, 2018

Via Messenger Delivery

To: Mark Roth
Roth Fioretti LLC
311 S. Wacker, Ste. 2470
Chicago, IL 60606

Re: *Protect Our Parks, et al. v. Chicago Park District, et al.*, 18 CV 3424

Dear Mark:

Enclosed herewith is a CD containing documents being produced on behalf of both Defendants in response to the Court's November 29, 2018 order.

First, we are producing a single set of agreements pertaining to the use of Park District land by the eight museums whose agreements were not submitted as part of Defendants' November 21 dispositive motion.

Second, we are producing a single set of, or direct you to, the following final studies analyzing the public benefits and detriments of locating the Obama Presidential Center on the Jackson Park site, as described below:

- The City of Chicago Department of Planning and Development's May 17, 2018 Report to the Chicago Plan Commission concerning The Barack Obama Foundation's application for approval under the Lake Michigan and Chicago Lakefront Protection Ordinance (Application No. 721) and application for approval of a Planned Development (Application No. 19495) (produced herewith)
- The City of Chicago Department of Planning and Development's May 17, 2018 Report to the Chicago Plan Commission concerning the Chicago Department of Transportation's application for approval under the Lake Michigan and Chicago Lakefront Protection Ordinance (Application No. 722) (produced herewith)
- *Jackson Park Revitalization Traffic Impact Study Final Report*, Sam Schwartz Transportation Consultants (Feb. 2018), available at:

30 NORTH LASALLE STREET, SUITE 1230, CHICAGO, ILLINOIS 60602

https://www.cityofchicago.org/content/dam/city/depts/dcd/supp_info/jackson/CDOT-Traffic-Impact-Study.pdf

- *A Place of Possibility: The Response to the Request for Qualifications*, The University of Chicago (June 16, 2014), available at: <https://www.obama.org/updates/rfp-responses-release/>
- *The Economic Impact of the Barack Obama Presidential Library in Chicago: An Analysis of Potential Sites near the University of Chicago on Chicago's South Side*, Anderson Economic Group, LLC (Apr. 25, 2014), submitted with *A Place of Possibility: The Response to the Request for Qualifications*, available at: <https://www.obama.org/updates/rfp-responses-release/>
- *The Economic Impact of the Barack Obama Presidential Library in Chicago: An Analysis of Potential Sites near the University of Chicago on Chicago's South Side*, Anderson Economic Group, LLC (Apr. 25, 2014) (abridged version) (produced herewith)
- *Improvement of Jackson Park and South Shore Golf Courses as part of the development of the Obama Presidential Library*, Renaissance Golf Design, Inc., submitted with *A Place of Possibility: The Response to the Request for Qualifications*, available at: <https://www.obama.org/updates/rfp-responses-release/>
- *A Place of Possibility: The Response to the Request for Proposal*, The University of Chicago (Dec. 11, 2014), available at: <https://www.obama.org/updates/rfp-responses-release/>
- *Visioning the Obama Presidential Library*, Transsolar, Inc., submitted with *A Place of Possibility: The Response to the Request for Qualifications*, available at: <https://www.obama.org/updates/rfp-responses-release/>
- Traffic and Parking Study by Sam Schwartz Engineering, DPC, submitted with Woodlawn Appendix to *A Place of Possibility: The Response to the Request for Proposal*, available at: <https://www.obama.org/updates/rfp-responses-release/>

Defendants reserve all objections to use of these documents in the litigation, including but not limited to lack of relevance.

Finally, we note that a variety of additional documents relating to the OPC are (and have been) publicly available on the following City, Park District, or Foundation websites:

https://www.cityofchicago.org/city/en/depts/mayor/supp_info/obama-presidential-center.html

https://www.cityofchicago.org/city/en/depts/dcd/supp_info/jackson-park-improvements.html

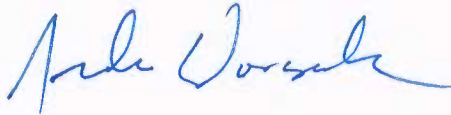
<https://www.southlakefrontplan.com/south-lakefront-framework-plan-report-042018>

<https://www.obama.org/updates/rfp-responses-release/>

https://www.obama.org/wp-content/uploads/Fact-Sheet__OPC-Economic-Impact.pdf

Please let us know if you have any questions. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Arlene J. Voss".

Chief Assistant Corporation Counsel
City of Chicago, Department of Law
Constitutional and Commercial Litigation Division
30 North LaSalle Street, Suite 1230
Chicago, Illinois 60602
(312) 744-7129

Encl.

cc: Joseph Roddy